

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK

CIMC RAFFLES OFFSHORE (SINGAPORE)  
LIMITED AND YANTAI CIMC RAFFLES  
OFFSHORE LIMITED,

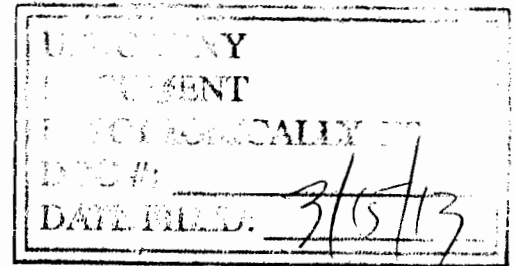
Petitioners,

v.

SCHAHIN HOLDING S.A., SCHAHIN  
ENGENHARIA S.A., SEA BISCUIT  
INTERNATIONAL INC., BLACK GOLD  
DRILLING LLC, BAERFIELD DRILLING  
LLC AND SORATU DRILLING LLC,

Respondents.

13 Civ. 0052 (JSR)  
ECF Case



*[Signature]*

**[PROPOSED] ORDER FOR ALTERNATIVE SERVICE ON FOREIGN  
RESPONDENTS**

Whereas, on December 26, 2012, an arbitral tribunal rendered a final arbitration award in favor of Petitioners CIMC Raffles Offshore (Singapore) Limited and Yantai CIMC Raffles Offshore Limited (collectively, "CIMC Raffles") and against Respondents.

Whereas, on January 2, 2013, CIMC Raffles filed the petition ("Petition") to confirm the final arbitration award and enter it as judgment.

Whereas, on January 23, 2013, Co-Respondents Baerfield Drilling LLC ("BDL"), Soratu Drilling LLC ("SDL") and Black Gold Drilling LLC ("Black Gold") were properly served with the Petition and a Summons.

Whereas, Co-Respondents BDL, SDL and Black Gold have the same directors as Respondents Schahin Holding S.A. (“Schahin Holding”), Schahin Engenharia S.A. (“Schahin Engenharia”) and Sea Biscuit International Inc. (“Sea Biscuit”).

Whereas, in a letter dated January 30, 2013, CIMC Raffles furnished Respondents Schahin Holding, Schahin Engenharia and Sea Biscuit with a request for waiver of service of process.

Whereas Schahin Holding, Schahin Engenharia and Sea Biscuit are long-standing clients of Linklaters LLP, and the law firm continues to represent these Respondents in legal proceedings in the United States and the United Kingdom.

Whereas, Paul Hessler of Linklaters LLP served as counsel to Schahin Holding, Schahin Engenharia and Sea Biscuit in the underlying arbitration and remains in contact with these Respondents.

IT IS HEREBY ORDERED that, pursuant to Rule 4(f)(3), 4(h)(2) of the Federal Rules of Civil Procedure, no later than March 18, 2013, CIMC Raffles shall serve:

1. Schahin Holding and Schahin Engenharia:
  - (a) By hand delivery on Mr. Paul Hessler and Mr. Michael Basset at Linklaters LLP, 1345 Avenues of Americas 19th Floor, New York, NY 10105;
  - (b) By Federal Express to Rua Vergueiro, No. 2009, 9th Floor, 04101-905 - São Paulo - S.P. – Brazil, Attn: Salim Taufic Schahin and Milton Taufic Schahin; and Rua Vergueiro, No. 2009, 5th floor, 04101-905 - São Paulo - S.P. – Brazil, Attn: Mr. João Alves Meira Neto; and
  - (c) By email to Salim Taufic Schahin (sschahin@schahin.com.br), Mr. João Alves Meira Neto

(jmeira@schahin.com.br) and Fernando Schahin  
(fschahin@schahin.com.br);

2. Sea Biscuit by hand delivery on Mr. Paul Hessler and Mr. Michael Basset at Linklaters LLP, 1345 Avenues of Americas 19th Floor, New York, NY 10105.

SO ORDERED:

Dated: New York, NY  
March 14, 2013

  
JED S. RAKOFF, U.S.D.J.